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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	
	:	
ROBERT SCHWEIDERICK and	:	Mag. No. 07-7049
GEORGE MORGAN	:	

I, Thomas J. Coyle, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

From in or about January 2006 to in or about May 2006, in Passaic County, in the District of New Jersey and elsewhere, defendants

ROBERT SCHWEIDERICK and  
GEORGE MORGAN

did knowingly and willfully conspire with each other and others to obstruct, delay and affect interstate commerce by extortion under color of official right, by obtaining corrupt payments that were paid by another, with that person's consent.

In violation of Title 18, United States Code, Section 1951(a).

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

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Thomas J. Coyle, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
March 23, 2007, at Newark, New Jersey

HONORABLE ESTHER SALAS  
UNITED STATES MAGISTRATE JUDGE

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Signature of Judicial Officer

## ATTACHMENT A

I, Thomas J. Coyle, a Special Agent with the Federal Bureau of Investigation ("FBI"), am aware of the following facts as a result of my investigation and after having spoken with other law enforcement officials:

1. At all times relevant to this Complaint, defendants ROBERT SCHWEIDERICK and GEORGE MORGAN were employees of the Passaic Valley Water Commission (the "PVWC"). As employees of the PVWC, defendants SCHWEIDERICK and MORGAN were responsible for, among other duties, activating water service for new apartment tenants in Paterson, New Jersey, and turning off water service at those apartments where the responsible party had failed to timely pay the applicable water bills.

2. At all times relevant to this Complaint, a cooperating witness, "C.W.," was an individual who was known in Paterson to be engaged in the real estate business. Specifically, C.W. was known to be an individual who helped buyers inside and outside New Jersey to purchase various residential properties in Paterson as "investments" for the buyers. In order to purchase the properties, C.W. and others helped the buyers to apply for mortgage loans from mortgage lenders located both inside and outside New Jersey. C.W. then "managed" these properties for the buyers by renting them to recipients of Section 8 housing benefits.

3. From in or about January 2006 to in or about May 2006, defendants ROBERT SCHWEIDERICK and GEORGE MORGAN agreed with each other and others to solicit and accept corrupt payments from C.W. in exchange for the performance of their official duties as PVWC employees. Defendants SCHWEIDERICK and MORGAN accepted cash and other payments from C.W. for, among other things, omitting to turn off water service at residential properties they believed to be owned and/or managed by C.W., despite the non-payment of bills at these properties, and promptly activating water service for new accounts at C.W.'s properties

4. On or about January 25, 2006, defendant ROBERT SCHWEIDERICK met with C.W. in Paterson, New Jersey. This meeting was consensually monitored and recorded by the FBI and the U.S. Department of Housing and Urban Development, Office of the Inspector General ("HUD OIG"). During the meeting, defendant SCHWEIDERICK accepted a \$100 cash payment from C.W. for turning or keeping water service on at two locations. Defendant SCHWEIDERICK informed C.W. that after his retirement, "Georgie" was to take over from him, and C.W. and defendant SCHWEIDERICK agreed to set up a meeting with defendant GEORGE MORGAN at a later date. Defendant SCHWEIDERICK further instructed C.W. that while he was on vacation, C.W. was to make all scheduled payments to defendant MORGAN.

5. On or about February 1, 2006, defendants ROBERT SCHWEIDERICK and GEORGE MORGAN met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG. At the meeting, defendant MORGAN indicated to C.W. that all financial arrangements would remain the same after defendant SCHWEIDERICK's retirement. Defendant SCHWEIDERICK indicated to C.W., in substance and in part, that C.W. owed him \$50 and that he needed a new list of C.W.'s apartments.

6. Defendant ROBERT SCHWEIDERICK accepted additional cash payments from C.W. on or about February 8, in the amount of \$50; February 23, in the amount of \$30; and April 7, 2006, in the amount of \$50. Each of these meetings was consensually monitored and recorded by the FBI and HUD OIG.

7. On or about May 2, 2006, C.W. made a telephone call to defendant ROBERT SCHWEIDERICK that was consensually monitored and recorded by the FBI and HUD OIG. During the call, defendant SCHWEIDERICK provided C.W. with a list of properties at which the water was scheduled to be turned off by the PVWC, telling C.W., in substance and in part, that he intended to turn the water off at those properties unless C.W. instructed him to keep it on. Defendant SCHWEIDERICK further informed C.W., in substance and in part, that he had turned the water on at four of C.W.'s properties in the previous week, that C.W. owed him a total of \$300, and that C.W. owed defendant GEORGE MORGAN a total of \$50.

8. On or about May 5, 2006, C.W. made a telephone call to defendant ROBERT SCHWEIDERICK that was consensually monitored and recorded by the FBI and HUD OIG. During the call, defendant SCHWEIDERICK provided the addresses of various properties at which he "didn't shut nothin' off." In the background, defendant GEORGE MORGAN stated, in substance and in part, that C.W. owed him \$50 for turning or keeping the water on at a specific address in Paterson. Defendant SCHWEIDERICK indicated that C.W. owed him \$350. C.W. made plans to meet with defendants SCHWEIDERICK and MORGAN later that day in order to make the necessary payments.

9. Later that day, on or about May 5, 2006, defendants ROBERT SCHWEIDERICK and GEORGE MORGAN met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG. Defendants SCHWEIDERICK and MORGAN reiterated that defendant MORGAN would be taking over the operation once defendant SCHWEIDERICK retired. Defendants SCHWEIDERICK and MORGAN accepted \$400 in cash from C.W., which they counted and divided between them.

10. On or about May 25, 2006, defendant ROBERT SCHWEIDERICK met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG. Defendant SCHWEIDERICK stated to C.W., in substance and in part, that C.W. still owed him for turning or keeping the water on at three properties. Defendant SCHWEIDERICK further stated, in substance and in part, that because he was about to retire, C.W. should deal with defendant MORGAN from that point forward.